

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JACKSON COUNTY RURAL ELECTRIC
COOPERATIVE, INC.

ALLEGED VIOLATION OF COMMISSION
REGULATIONS 807 KAR 5:006 AND 807 KAR
5:041

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) CASE NO. 97-381
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O R D E R

IT IS ORDERED that Jackson County Rural Electric Cooperative, Inc. ("Jackson County") shall file the original and 8 copies of the following information with the Commission within 14 days of the date of this Order, with a copy to all parties of record. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. Where requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this Order.

1. a. Does Jackson County agree with the description of the incident contained in the Utility Accident Investigation Report of November 15, 1996?

b. If no, identify those portions of the description with which Jackson County does not agree and, for each portion, state why Jackson County disagrees.

2. a. Does Jackson County agree that members of the Pike Construction Company crew who were performing the work at the time of the August 20, 1996 incident failed to comply with National Electrical Safety Code¹ Rule 422A?

b. If no, state why not.

3. a. Does Jackson County agree that members of the Pike Construction Company crew who were performing the work at the time of the August 20, 1996 incident **willfully** failed to comply with National Electrical Safety Code Rule 422A?

b. If no, state why not.

4. a. Does Jackson County agree that members of the Pike Construction Company crew who were performing the work at the time of the August 20, 1996 incident failed to comply with Jackson County's Safety Manual for An Electric Utility §619(d)(4)?

b. If no, state why not.

5. a. Does Jackson County disagree with any finding contained on pages 1 and 2 of the Utility Accident Investigation Report of November 15, 1996?

b. Identify each finding with which Jackson County disagrees and state why Jackson County disagrees with that finding.

¹ All references to the National Electrical Safety Code are to the 1990 edition.

6. a. At the time of the August 20, 1996 incident, was the Pike Construction Company crew performing work in furtherance of a construction contract with Jackson County?

b. If yes, provide a copy of the construction contract between Jackson County and the Pike Construction Company.

7. a. Does Pike Construction Company still perform construction work for Jackson County?

b. Describe the nature of this work.

8. How long has Pike Construction Company performed construction work for Jackson County?

9. a. In the last 10 years, how many safety incidents have occurred which involved injuries or service interruptions and which involved a Pike Construction Company work crew performing construction work for Jackson County.

b. For each incident, state the date of the incident, the nature of the injury or service interruption, and describe the incident and the action taken by Jackson County in response to the incident.

10. a. Does Jackson County perform any inspections of the work performed by the Pike Construction Company under their construction contract?

b. If yes,

(1) How often are inspections performed for each work project?

(2) Who performs the inspections?

(3) When are the inspections generally performed?

(4) For what conditions do Jackson County's inspectors inspect?

(5) Provide any written guidelines that Jackson County has for its inspectors.

(6) If a Jackson County inspector discovers that a Pike Construction Company employee is acting in a manner contrary to the National Electrical Safety Code, what action is he to take?

11. a. Prior to the incident, had any Jackson County employee been to the incident site on August 20, 1996 to inspect the work that the Pike Construction Company was performing?

b. If yes, identify this employee(s) and state the time when he had visited the incident site.

12. Provide all memoranda, correspondence, and other documents in which Jackson County discussed the work performance of the Pike Construction Company compliance with the National Electrical Safety Code and any other applicable safety codes or rules.

13. What investigation of Pike Construction Company's background did Jackson County perform prior to entering into a construction contract with that company?

14. What investigation of a contractor's background does Jackson County perform prior to entering into any contract for construction work?

15. Provide any reports on the August 20, 1996 incident which were prepared by any local, state, or federal governmental agency and which have not previously been submitted to the Commission.

16. a. State whether any civil actions arising out of the August 20, 1996 incident have been brought against Jackson County.

b. If yes, for each action:

(1) Identify the complainant.

(2) Provide a copy of the complaint.

(3) Provide a copy of any answer or response made by Jackson County.

(4) What is its current status?

17. Describe Jackson County's actions since the August 20, 1996 incident to prevent similar incidents.

18. a. Identify all Jackson County employees who were at the incident site at the time of the incident.

b. For each employee listed, state his or her duty position and the reason that he or she was at the incident site.

19. Identify the witnesses whom Jackson County intends to call at the scheduled hearing and summarize the expected testimony of each witness.

20. Provide the mailing address and telephone number for the following persons:

a. Harold Creech

b. Rodney McIntosh

c. Gary Williams

d. Tim Collins

21. For each person listed in Question 20,

- a. State the length of his employment with Pike Construction Company.
- b. List all positions with Pike Construction Company which he has held, his length of service at each position, and each position's duties.
- c. List all other positions which he has held which involved the construction or maintenance of electric distribution lines.
- d. Describe his educational background (including any technical or vocational education).

22. a. Is Jackson County aware of any disciplinary action taken against any of the persons listed in Question 20 for failing to comply with the National Electrical Safety Code or other applicable safety codes?


b. If yes, identify the person(s), state the nature of incident for which disciplinary action was taken, and the nature of the disciplinary action.

Done at Frankfort, Kentucky, this 7th day of April, 1998.

PUBLIC SERVICE COMMISSION


For the Commission

ATTEST:


Executive Director